

Exhibit C

Matthew J. Hank, Esquire
 Haley R. Norwillo, Esquire
 LITTLER MENDELSON, P.C.
 Three Parkway
 1601 Cherry Street, Suite 1400
 Philadelphia, PA 19102.1321
 267.402.3000 (t)
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*Attorneys for Plaintiff
 Omnis Global Technologies, LLC*

**OMNIS GLOBAL
 TECHNOLOGIES, LLC**

Plaintiff,

v.

MICHELLE CHRISTIAN,

Defendant.

COURT OF COMMON PLEAS
 BUCKS COUNTY
 CIVIL DIVISION

Civil Action No. 2023-06293

Judge Jordan B. Yeager

VERIFIED COMPLAINT

1. Plaintiff Omnis Global Technologies, LLC ("Omnis") employed Defendant Michelle Christian ("Ms. Christian") as Vice President of Government Relations from November 16, 2020, until she resigned on August 30, 2023.
2. On July 24, 2023, Ms. Christian purchased a laptop computer and a printer at the Best Buy electronics store in Fairless Hills, Pennsylvania.
3. Ms. Christian's July-August 2023 expense report shows she expensed the laptop and printer as Omnis office supplies subject to reimbursement.

4. Despite repeated attempts by Omnis to collect the laptop and printer from Ms. Christian since her resignation, Ms. Christian has failed to return the laptop and printer. Ms. Christian's refusal to return Omnis property has interfered with Omnis's right to control that property.

PARTIES

5. Omnis is an LLC that specializes in developing, licensing, and commercializing technologies to aid in the areas of clean and sustainable energy, affordable housing, organic farming, and biodegradable plastics.

6. Ms. Christian resides in Bucks County, Pennsylvania, where she also worked remotely for Omnis.

7. The Court has subject matter jurisdiction under 42 Pa. C.S.A. § 931(a).

8. The Court has personal jurisdiction over Ms. Christian because she resides in or regularly conducts business within Pennsylvania.

9. Venue is proper in this Court because a transaction or occurrence from which the cause of action arose occurred in Bucks County, Pennsylvania, and because Ms. Christian lives in Bucks County, Pennsylvania.

FACTUAL BACKGROUND

10. Omnis, acting through the person of Karen Shaw, then Director of Human Resources, hired Ms. Christian as the Vice President of Government Relations on October 23, 2020, with employment beginning on November 16, 2020.

11. Ms. Christian's responsibilities involved managing Omnis's relationships with government officials and entities.

12. To carry out those responsibilities, Ms. Christian required a laptop and printer.

13. On July 24, 2023, Ms. Christian purchased a laptop and a printer from Best Buy for a total of \$1,949.23. (*See* Exh. A.)

14. In August of 2023, Ms. Christian submitted for reimbursement her July-August 2023 expense report, which included the July 24th \$1,949.23 purchase of a laptop and printer categorized as “office supplies.” *Id.*

15. Ms. Christian was reimbursed by Omnis for this purchase.

16. On August 30, 2023, Ms. Christian resigned from her position at Omnis.

17. Ms. Christian maintains her employment with Omnis ended later, but it is undisputed that her separation from Omnis occurred no later than September 9, 2023.

18. In a letter dated September 9, 2023, and sent to Ms. Christin by Mat Hart, the current Vice President of Human Resources, Ms. Christian was directed “to gather and return all company property, *laptop*, keys, Omnis related documents, files, downloads, data, whether or not confidential or proprietary, in paper or electronic form...” (emphasis added)

19. Since Ms. Christian’s resignation, Omnis through counsel repeatedly attempted to collect Omnis’s laptop and printer.

20. Ms. Christian has failed to return Omnis’s laptop and printer.

21. Omnis suspects Ms. Christian may have other Omnis property. Part of the reason it needs the laptop back is to investigate that suspicion.

COUNT I: CONVERSION

22. Omnis incorporates by reference the preceding paragraphs.

23. Ms. Christian has intentionally exercised dominion and control over Omnis’s property, including its laptop computer and printer so as to interfere with Omnis’s right to control that property.

24. Ms. Christian's actions were and are intentional, willful, outrageous, and malicious.

PRAYER FOR RELIEF

WHEREFORE, Omnis demands judgment against Ms. Christian and requests the following relief:

a. A judgment in Omnis's favor and against Ms. Christian for monetary damages, including, but not limited to, all amounts necessary to compensate Omnis for Ms. Christian's wrongful possession of its' property, including reasonable attorneys' fees and costs.

b. A permanent injunction requiring Ms. Christian to return and refrain from using Omnis's property, including Omnis's laptop and printer.

Respectfully submitted,

/s/ Matthew J. Hank

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Attorneys for Plaintiff
Omnis Global Technologies, LLC

Dated: December 22, 2023

CERTIFICATE OF SERVICE

I, Matthew J. Hank, certify that on December 22, 2023 I served the foregoing Verified Complaint via ECF, giving notice to the Defendant:

Michelle Christian
109 Signal Hill Road
Holland, PA 18966

Defendant

/s/ Matthew J. Hank
Matthew J. Hank

Supreme Court of Pennsylvania

Court of Common Pleas

Civil Cover Sheet

Bucks

County

For Prothonotary Use Only:

Docket No:

TIME STAMP

The information collected on this form is used solely for court administration purposes. This form does not supplement or replace the filing and service of pleadings or other papers as required by law or rules of court.

Commencement of Action:

- ☒ Complaint
 ☐ Writ of Summons
 ☐ Petition
 ☐ Transfer from Another Jurisdiction
 ☐ Declaration of Taking

Lead Plaintiff's Name:

Omnis Global Technologies, LLC

Lead Defendant's Name:

Michelle Christian

Are money damages requested? ☒ Yes ☐ NoDollar Amount Requested:
(check one)

- ☒ within arbitration limits
☐ outside arbitration limits

Is this a *Class Action Suit*? ☐ Yes ☒ NoIs this an *MDJ Appeal*? ☐ Yes ☒ No

Name of Plaintiff/Appellant's Attorney: Matthew J. Hank, Esq., Haley R. Norwillo, Esq.

☐ Check here if you have no attorney (are a Self-Represented [Pro Se] Litigant)
Nature of the Case:

Place an "X" to the left of the ONE case category that most accurately describes your **PRIMARY CASE**. If you are making more than one type of claim, check the one that you consider most important.

TORT (do not include Mass Tort)

- ☒ Intentional
☐ Malicious Prosecution
☐ Motor Vehicle
☐ Nuisance
☐ Premises Liability
☐ Product Liability (does not include mass tort)
☐ Slander/Libel/ Defamation
☐ Other:

MASS TORT

- ☐ Asbestos
☐ Tobacco
☐ Toxic Tort - DES
☐ Toxic Tort - Implant
☐ Toxic Waste
☐ Other:

PROFESSIONAL LIABILITY

- ☐ Dental
☐ Legal
☐ Medical
☐ Other Professional:

CONTRACT (do not include Judgments)

- ☐ Buyer Plaintiff
☐ Debt Collection: Credit Card
☐ Debt Collection: Other

- ☐ Employment Dispute: Discrimination
☐ Employment Dispute: Other

☐ Other:
REAL PROPERTY

- ☐ Ejectment
☐ Eminent Domain/Condemnation
☐ Ground Rent
☐ Landlord/Tenant Dispute
☐ Mortgage Foreclosure: Residential
☐ Mortgage Foreclosure: Commercial
☐ Partition
☐ Quiet Title
☐ Other:

CIVIL APPEALS

- Administrative Agencies
☐ Board of Assessment
☐ Board of Elections
☐ Dept. of Transportation
☐ Statutory Appeal: Other

- ☐ Zoning Board
☐ Other:

MISCELLANEOUS

- ☐ Common Law/Statutory Arbitration
☐ Declaratory Judgment
☐ Mandamus
☐ Non-Domestic Relations
☐ Restraining Order
☐ Quo Warranto
☐ Replevin
☐ Other:

Updated 1/1/2011

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BUCKS COUNTY
CIVIL DIVISION

Civil Action No. 2023-06293

**OMNIS GLOBAL TECHNOLOGIES, LLC'S INTERROGATORIES
DIRECTED TO MICHELLE CHRISTIAN**

Plaintiff Omnis Global Technologies, LLC. ("Omnis") by and through its undersigned counsel, hereby makes demand upon Defendant Michelle Christian ("Christian"), pursuant to Rule 4003.1 and Rule 4005 of the Pennsylvania Rules of Civil Procedure, to serve written answers, under oath, to the following Interrogatories within 30 days of service hereof in compliance with the Pennsylvania Rules of Civil Procedure. Defendant Christian shall serve her Verified Answers at the law offices of Littler Mendelson, P.C., c/o Matthew Hank and Haley Norwillo, Three Parkway, 1601 Cherry Street, Suite 1400, Philadelphia, PA 19102.

INSTRUCTIONS

1. If the answer to an Interrogatory is “none,” “unknown,” or “not applicable,” such statement must be written as the answer.
2. Respond to each Interrogatory separately.
3. Where exact information cannot be furnished, estimated information should be supplied. Where an estimate is used, it should be identified as such and accompanied by an explanation as to the basis on which the estimate was made and the reason exact information cannot be furnished.
4. These Interrogatories are considered continuing and, therefore, should be modified or supplemented as you obtain further or additional information up to the time of trial of this case.
5. If a claim of privilege is asserted by Christian, identify:
 - (a) the privilege being claimed, and set forth the facts underlying the invocation of the privilege;
 - (b) if the basis for the privilege is a document:
 - (i) the nature of the document (for example, letter, memorandum, report);
 - (ii) the date of the document;
 - (iii) each person who authored the document;
 - (iv) the person who signed the document;
 - (v) each person who received the document;
 - (vi) each person who received copies of the document;
 - (vii) each person to whom the contents of the document were disclosed;
 - and
 - (viii) the subject matter of the document.

of all persons present at the time of the communication, the date, time and location of the communication, the identity of all documents recording or summarizing the communication and the method of communication used.

11. The terms “concern” or “concerning” means referring to, describing, supporting, offering evidence of, or constituting.

INTERROGATORIES

1. Do you have in your possession, custody, or control any property (tangible or intangible) that belongs to Omnis, regardless of whether the property constitutes confidential or trade secret information? If so, identify and describe all such property.

ANSWER:

2. Identify each electronic device in your possession that has stored information related to Omnis. For each, state or describe:

- (a) The purpose of storing the information on the electronic device;
- (b) A description of the content stored on the electronic device;
- (c) The person, if any, who directed you to take such actions.

ANSWER:

3. Identify and describe all communications between any Omnis supervisor, manager, member, or owner and Christian from August 23, 2023, to the present. For each such communication:

- (a) Identify the date of the communication.
- (b) Identify all persons who participated in or witnessed the communication (including, but not limited to, all persons who sent, received, or were copied written communications (electronic or otherwise), and all persons who engaged in, heard, or witnessed oral communications).
- (c) Identify all persons who have personal knowledge of the communication.
- (d) Describe the method of the communication (*e.g.*, in-person conversation, telephone call, letter, email, text message).

ANSWER:

4. Do you have any documents or communications in your possession, custody, or control that constitute or refer to (or that you believe may constitute or refer to) any of Omnis's confidential or trade secret information, including but not limited to, information about current or former governmental contracts or contacts?

ANSWER:

5. If your answer to the proceeding Interrogatory is anything other than an unqualified "no," then identify all documents in your possession, custody, or control that constitute or refer to (or that you believe may constitute or refer to) any of Omnis's confidential or trade secret information, including but not limited to, information about current or former governmental contracts or contacts.

ANSWER:

6. Identify and describe all communications you have had with Omnis employees or supervisors since the beginning of your employment on November 16, 2020, to the present that refer to your intention to purchase and expense for reimbursement a laptop or printer, and:

- (a) Identify the date of the communication.
- (b) Identify all persons who participated in or witnessed the communication (including, but not limited to, all persons who sent, received, or were copied written communications (electronic or otherwise), and all persons who engaged in, heard, or witnessed oral communications).
- (a) Identify all persons who have personal knowledge of the communication.
- (b) Describe the method of the communication (*e.g.*, in-person conversation, telephone call, letter, email, text message).
- (c) If the communication was in-person, identify the location where the communication took place.
- (d) Identify all documents that constitute or refer to the communication.

ANSWER:

7. Identify and describe all communications you have had with any current or former Omnis employee (from January 1, 2022, to the present) that relate or refer to (a) your intention to resign from Omnis, (b) your resignation from Omnis, (c) your professional plans outside of Omnis, (d) any current or former customers of Omnis, or (e) any career or job opportunities outside of Omnis. For each such communication:

- (a) Identify the date of the communication.
- (b) Identify all persons who participated in or witnessed the communication (including, but not limited to, all persons who sent, received, or were copied written communications (electronic or otherwise), and all persons who engaged in, heard, or witnessed oral communications).
- (c) Identify all persons who have personal knowledge of the communication.

- (d) Describe the method of the communication (*e.g.*, in-person conversation, telephone call, letter, email, text message).
- (e) If the communication was in-person, identify the location where the communication took place.
- (f) Identify all documents that constitute or refer to the communication.

ANSWER:

*Attorneys for Plaintiff
Omnis Global Technologies, LLC.*

Defendant.

Civil Action No. 2023-06293

Plaintiff Omnis Global Technologies, LLC (“Omnis”) by and through its undersigned counsel, hereby makes demand upon Defendant Michelle Christian (“Ms. Christian”), pursuant to Rule 4009.1 of the Pennsylvania Rules of Civil Procedure, to identify and produce the documents requested herein, under oath, and to provide Verified Responses in response to these Post-Complaint Requests for Production of Documents within 30 days of service hereof in compliance with the Pennsylvania Rules of Civil Procedure. Defendant Michelle Christian shall serve her Verified Responses and the documents requested herein at the law offices of Littler Mendelson,

- (c) the duration of the occurrence;
- (d) the identity of all persons present, whether or not participating in the occurrence;
- (e) that which each person said or did;
- (f) the identity of all documents relating to the occurrence;
- (g) the identity of all persons having knowledge of the occurrence; and
- (h) the dates when and means whereby such knowledge was acquired.

8. “Identify” when used in reference to a document means to state its date, author, addressee, type, and present custodian. In lieu of such identification, a legible copy may be produced.

9. “Identify” when used in reference to a person means to state the person’s full name, current home and business addresses, and employment.

10. “Identify” when used in reference to a communication means to state the identity of all persons present at the time of the communication, the date, time and location of the communication, the identity of all documents recording or summarizing the communication and the method of communication used.

11. The terms “concern” or “concerning” means referring to, describing, supporting, offering evidence of, or constituting.

DOCUMENT REQUESTS

1. Produce all documents Christian identified in her Answers to Omnis’ Post-Complaint Interrogatories.

RESPONSE:

2. Produce all communications between Christian and Simon Hodson between January 1, 2023, to present.

RESPONSE:

3. Produce all communications between Christian and Jonathan Hodson between January 1, 2023, to present.

RESPONSE

4. Produce all communications between Christian and Mat Hart between January 1, 2023, to present.

RESPONSE:

5. Produce all communications between Christian and Blake Stephens between March of 2023, to present.

RESPONSE:

6. Produce all communications between Christian and any current or former Omnis employee or intern, including but not limited to Richard Hulme, from January 1, 2023, to present.

RESPONSE:

7. Produce all property belonging to Omnis, including the laptop and printer discussed in the Complaint.

RESPONSE:

8. Produce all communications between Christian and Omnis regarding the laptop and printer Christian purchased on July 24, 2023 and submitted as an expense for reimbursement in August of 2023.

RESPONSE:

9. Produce all documents that contain or refer to Omnis's confidential or trade secret information, including but not limited to, information about Omnis's current or former governmental contracts or contacts.

RESPONSE:

10. Produce all document referred to in the Complaint.

RESPONSE:

Exhibit A

Form of Production/Load File Specifications

OMNIS GLOBAL
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A. Production Format in General.

All documents (whether originally electronic or hard copy paper) should be produced as TIFF image files[#] (black-and-white) and as JPEG image files[#] (color) in electronic form on a CD-ROM (or on other removable media), or delivered via secured FTP. All production documents should be accompanied by a Concordance .DAT load file. The Concordance .DAT file should contain the following delimiters:

Field Separator	¶	(ASCII:0020)
Quote	”	(ASCII:0025)
Multi-Entry Delimiter	;	(ASCII:0059)
<Return> Value in Data	®	(ASCII:0174)

The TIFF images should be produced as single-page Group IV TIFF format with an Opticon image load file. The Opticon image load file should contain the BEGBATES value for each corresponding document and appropriate path or folder information to the corresponding images that comprise each document. Each TIFF or JPEG image should be individually Bates numbered (each party using a unique prefix of letters as appropriate, without punctuation, and each page